

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

UNITED STATES SECURITIES AND )  
EXCHANGE COMMISSION, )  
 )  
Plaintiff, )  
 )  
v. ) NO. 1:15-cv-659-JMS-MJD  
 )  
VEROS PARTNERS, INC., )  
MATTHEW D. HAAB, )  
JEFFERY B. RISINGER, )  
VEROS FARM LOAN HOLDING LLC )  
TOBIN J. SENEFELD, )  
FARMGROWCAP LLC, and )  
PINCAP LLC, )  
 )  
Defendants. )  
 )  
PIN FINANCIAL LLC, )  
 )  
Relief Defendant. )

**DEFENDANT TOBIN J. SENEFELD'S PRELIMINARY WITNESS LIST**

Defendant Tobin J. Senefeld ("Senefeld") hereby submits his Preliminary Witness List.

1. Defendant Matthew Haab  
c/o J. Richard Kiefer  
James J. Bell  
John F. MccCauley  
BINGHAM GREENEBAUM DOLL LLP  
2700 Market Tower  
10 West Market Street  
Indianapolis, IN 46204
  
2. Defendant Jeffery B. Risinger  
c/o Ronald E. Elberger  
Jeffrey B. Bailey  
BOSE MCKINNEY & EVANS, LLP  
111 Monument Circle  
Suite 2700  
Indianapolis, IN 46204

3. Shawn Gustafson
4. Harold Birch
5. Joe Boyer
6. Marty Kirbach
7. Brad Stephenson
8. Jim Williams
9. Brandt Downing
10. Mark Schaefer
11. Robert Mitchell
12. Any employees or other representatives of Veros Partners, Inc. with knowledge relating to the allegations or defenses of any party in this matter.
13. All investors and/or borrowers in any transaction at issue in this matter.
14. All witnesses, not otherwise objectionable, identified during discovery of this action, including individuals identified by Plaintiff or any other party in any party's witness lists and/or discovery responses or a deposition conducted by any party.
15. Any as yet unidentified expert witness to be designated by any established case management deadline or otherwise established by the Court.
16. Any persons with knowledge of the damages alleged in this matter.
17. Any witnesses deposed in this case.
18. Appropriate record keepers of parties or non-parties subpoenaed in this case.
19. All witnesses necessary to authenticate documents.
20. All witnesses necessary for rebuttal or impeachment.

21. Subject to investigation and discovery, additional witnesses may be discovered which support the claims and defenses in this matter. As this case is in its preliminary stages and discovery is ongoing, Senefeld reserves the right to modify, amend or supplement this list as additional witnesses become available.

Respectfully submitted,

Dated: September 4, 2015

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Jeanine Kerridge  
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*Attorney for Defendant Tobin J. Senefeld*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 4th day of September, 2015, a copy of the foregoing was filed electronically using the CM/ECF system and is available to all counsel of record using same.

Jeanine Kerridge  
Jeanine Kerridge